

SLR:LDM:TRP
F. #2017R01691

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

19-CR-408 (MKB)

ISKYO ARONOV,
also known as "Isaac Aronov,"
MICHAEL KONSTANTINOVSKIY,
also known as "Michael Kay,"
TOMER DAFNA,
AVRAHAM TARSHISH,
also known as "Avi Tarshish," and
MICHAEL HERSKOWITZ,

Defendants.

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The United States of America, by and through SETH D. DuCHARME, Acting United States Attorney for the Eastern District of New York, and Tanisha R. Payne, Assistant United States Attorney, hereby files the following Bill of Particulars for forfeiture of property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and 982(a)(2), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c). The United States hereby gives notice that it seeks forfeiture of the following additional property:

1. The real property and premises located at 769 MacDonough Street, Brooklyn, New York, and all proceeds traceable thereto;
2. The real property and premises located at 94 Monroe Street, Brooklyn, New York, and all proceeds traceable thereto;

3. The real property and premises located at 857 Lincoln Place, Brooklyn, New York, and all proceeds traceable thereto;
4. The real property and premises located at 369 Tomkins Avenue, Brooklyn, New York, and all proceeds traceable thereto;
5. The real property and premises located at 442 Quincy Street, Brooklyn, New York, and all proceeds traceable thereto;
6. The real property and premises located at 114 Adelphi Street, Brooklyn, New York, and all proceeds traceable thereto;
7. The real property and premises located at 981 Hancock Street, Brooklyn, New York, and all proceeds traceable thereto;
8. The real property and premises located at 313 Van Buren Street, Brooklyn, New York, and all proceeds traceable thereto;
9. The real property and premises located at 282 Schaefer Street, Brooklyn, New York, and all proceeds traceable thereto;
10. The real property and premises located at 218 Quincy Street, Brooklyn, New York, and all proceeds traceable thereto; and
11. The real property and premises located at 56 Mother Gaston Boulevard, Brooklyn, New York, and all proceeds traceable thereto.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
August 24, 2020

SETH D. DuCHARME
Acting United States Attorney
Eastern District of New York
271-A Cadman Plaza East
Brooklyn, New York 11201

By: /s/ *Tanisha R. Payne*
Tanisha R. Payne
Assistant United States Attorney
(718) 254-6358

cc: All Counsel of Record (by ECF)